

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ALBERT L. GRAY, Administrator, <i>et al.</i> , Plaintiffs,)	C.A. No. 04-312L
v.)	
AMERICAN FOAM CORPORATION, <i>et al.</i> , Defendants.)	
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ESTATE OF JUDE B. HENAUT, <i>et al.</i> , Plaintiffs,)	C.A. No. 03-483L
v.)	
AMERICAN FOAM CORPORATION, <i>et al.</i> , Defendants.)	
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**THE CLEAR CHANNEL DEFENDANTS¹ MOTION TO APPROVE
“GOOD FAITH” SETTLEMENT IN ACCORDANCE WITH
RHODE ISLAND GENERAL LAWS §§ 10-6-7 AND 10-6-8**

The Clear Channel Defendants hereby move this Court for an order approving their gross settlement with all plaintiffs in the above-captioned cases, in the amount of \$22,000,000, as a “good faith” settlement in accordance with sections 10-6-7 and 10-6-8 of the Rhode Island General Laws, so as to extinguish all potential contribution claims by joint tortfeasors. In support of this Motion, the Clear Channel Defendants submit the accompanying Memorandum

¹ For the purposes of this Motion and the accompanying Memorandum of Law and Affidavit, the “Clear Channel Defendants” include Capstar Radio Operating Company, as successor-in-interest to WHJY, Inc., formerly a Rhode Island corporation that operated WHJY-FM (collectively “WHJY”), and Clear Channel Broadcasting, Inc. (“CCB”).

of Law and the Affidavit of James J. Restivo, Jr., the contents of which are incorporated by reference in this Motion.

Dated: March 3, 2009

Respectfully submitted,

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